

EXHIBIT 2

From: Arnie Weintraub [aweintraub@weintraubgroup.com]
Sent: Thursday, July 26, 2012 5:09 PM
To: Schapira, Lisa
Subject: RE: Rockwell v. Secure Crossing:

Please include Elana Gloetznier in all emails. She is at elana@wgplc.com. As you know discovery is ongoing, as responsive docs are found they will be produced. Without debating the issue, I do not know what you mean by "woefully deficient".

From: Schapira, Lisa [<mailto:LSchapira@chadbournel.com>]
Sent: Thursday, July 26, 2012 5:03 PM
To: Arnie Weintraub
Cc: Balber, Scott; Tanck, Paul
Subject: Rockwell v. Secure Crossing:

Mr. Weintraub:

Secure Crossing's production is woefully deficient. After delaying for more than three months, Secure Crossing has only produced around 70 documents, many of which are publically available. We need to understand why such little information has been produced. Please confirm the following:

- (1) what custodians were searched;
- (2) whether electronic and hard copy sources were searched;
- (3) what search terms were applied to the ESI;
- (4) whether Secure Crossing is withholding documents responsive to Rockwell's document requests aside from computer code, flow charts, and design specifications for the accused products;
- (5) if additional responsive documents are being withheld please describe the nature of those documents and the reason they are being withheld; and
- (6) the volume of documents being withheld because of Secure Crossing's concerns over confidentiality.

Thank you,
Lisa

Lisa Schapira
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